

KOSTELANETZ & FINK, LLP
7 WORLD TRADE CENTER, 34TH FLOOR
NEW YORK, NEW YORK 10007

WASHINGTON, D.C. OFFICE
601 NEW JERSEY AVENUE, NW, SUITE 260
WASHINGTON, DC 20001

TEL: (212) 808-8100
FAX: (212) 808-8108
www.kflaw.com

TEL: (202) 875-8000
FAX: (202) 844-3500

May 2, 2022

VIA ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Cognizant Technology Solutions Corp. v. Bohrer, PLLC et ano.
Civil Docket #: 1:21-cv-05340-RA

Dear Judge Abrams:

I write, pursuant to Local Civil Rule 7.1(d), on behalf of Defendants Bohrer, PLLC and Jeremy I. Bohrer (“Defendants” or the “Bohrer Firm”) to request a brief adjournment of the oral argument, currently scheduled for May 5, 2022, with respect to Defendants’ motion to dismiss or, in the alternative, stay. Defendants seek a brief adjournment of this oral argument, from the originally scheduled date of May 5, 2022, to May 10, 2022, to allow criminal defense counsel for Steven Schwartz from Gibbons P.C. (“Gibbons”) and Paul, Weiss, Rifkind Wharton & Garrison LLP (“Paul Weiss”) to attend the oral argument. This is the first request by Defendants for an adjournment of this oral argument. As further explained below, Cognizant does not oppose this adjournment request provided that it can be quickly rescheduled as requested.

While this is an action by Plaintiff Cognizant Technology Solutions Corp. (“Cognizant”) against the Bohrer Firm, since it implicates legal fees paid to the Bohrer Firm with respect to its representation of Steven Schwartz in the federal criminal case pending against Mr. Schwartz in the District of New Jersey, the case is of concern to Mr. Schwartz and the other members of his criminal defense team at Gibbons and Paul Weiss. Lawyers at Gibbons and Paul Weiss wish to be present at the argument, and, due to a scheduling conflict, they have asked that the argument be adjourned. All counsel are available on May 10, if the Court can find time for argument on that day.

Cognizant’s counsel has asked me to inform the Court that Cognizant does “not oppose the adjournment if the argument can be rescheduled promptly for a date [Cognizant’s counsel] are available and at the Court’s convenience, because [Cognizant does] not want to materially

Honorable Ronnie Abrams
May 2, 2022
Page 2

delay these proceedings and believe[s] that [I] should be prepared to answer the Court's questions and that [Defendants'] desire to have other attorneys, who are not counsel to any parties in this case, attend the argument to observe should have been coordinated by [Defendants] beforehand." Cognizant's counsel has confirmed their availability on May 10.

We believe that the Court will benefit from having Mr. Schwartz's other criminal defense counsel in the courtroom, and their presence will assist them in representing Mr. Schwartz in the criminal case.

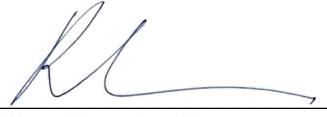
We thank Your Honor for your consideration of this request.

Respectfully,

/s/ *Claude M. Millman*
Claude M. Millman
Kostelanetz & Fink, LLP
(cell phone: 917-776-7872)

Application granted. The oral argument is hereby adjourned to May 10, 2022 at 11:00 a.m.

SO ORDERED.


Hon. Ronnie Abrams
5/3/22